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Attorneys for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CHEYNE ANDERSON, JESUS CASTELLANO,
HANNAH MIRZA, KATHLEEN O'BEIRNE,
SETH TAYLOR, WILLIAM VAN DER LAAR,
MARK WESLEY DUDLEY, RACHEL
WESTRICK, JIAJUN XU, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 25-CV-03268-BLF

**JOINT STIPULATION REGARDING
BRIEFING SCHEDULE FOR
MOTION TO DISMISS AND
RESETTING DEADLINES FOR
CASE MANAGEMENT
CONFERENCE AND STATEMENT**

Date: September 18, 2025
Time: 9:00 AM
Dept.: Courtroom 1
Judge: Hon. Beth Labson Freeman

1 Pursuant to Civil Local Rule 6-2, Plaintiffs Cheyne Anderson, Jesus Castellano, Hannah
2 Mirza, Kathleen O’Beirne, Seth Taylor, William Van Der Laar, Mark Westley Dudley, Rachel
3 Westrick, and Jianjun Zu (“Plaintiffs”), and Defendant Google LLC (“Defendant”) (collectively,
4 the “Parties”) stipulate and respectfully request that the Court enter an order setting a briefing
5 schedule regarding Defendant’s Motion to Dismiss (ECF No. 22), and continuing the Initial Case
6 Management Conference to after October 27, 2025 and the due date for the Joint Case Management
7 Statement and ADR Certification to October 21, 2025.

8 WHEREAS, Plaintiffs filed their Complaint on April 11, 2025. (ECF No. 1.)

9 WHEREAS, Plaintiffs filed their Amended Complaint on April 17, 2025. (ECF No. 8.)

10 WHEREAS, Defendant filed its Motion to Dismiss the Amended Complaint on June 16,
11 2025, seeking dismissal of each and every cause of action in the Complaint, as well as dismissal of
12 the class allegations. (ECF No. 22.)

13 WHEREAS, the hearing on the pending Motion to Dismiss is set for September 18, 2025
14 (*Id.*)

15 WHEREAS, the Court’s decision on the pending Motion to Dismiss could significantly
16 impact the scope of the claims in this case and, relatedly, the approach to ADR and case
17 management deadlines.

18 WHEREAS, the Parties agree that judicial economy and efficiency may best be served by
19 resetting the current case management dates in this case and staying discovery until at least the
20 resolution of Defendant’s Motion to Dismiss.

21 NOW THEREFORE, the Parties hereby jointly stipulate, agree, and respectfully request an
22 Order as follows:

- 23 1. That the due date for Plaintiffs’ Opposition to the Motion to Dismiss filed by Google
24 be continued to July 25, 2025.
- 25 2. That the due date for Defendant’s Reply in Support of its Motion to Dismiss be
26 continued to August 28, 2025.

3. That the Initial Case Management Conference be continued from July 17, 2025 to a date after October 27, 2025, with the Parties' initial disclosures pursuant to Federal Rule of Civil Procedure 26 due 14 days thereafter.

4. That the due date for the Parties' Joint Case Management Statement and ADR Certification be continued to October 21, 2025.

5. That discovery in this case is stayed until Defendant's Motion to Dismiss is resolved.

The proposed time modifications will not affect any other scheduled deadlines in this case.

A Proposed Order is being filed in connection with this Stipulation.

Dated: June 24, 2025

Respectfully submitted,

LEVI RATNER, P.C.

JONES DAY

By: /s/ Aleksandr L. Felstiner

By: /s/ Aaron L. Agenbroad

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ATTESTATION

I, Aaron L. Agenbroad, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that counsel of record for all Parties have concurred in this filing.

/s/ Aaron L. Agenbroad
Aaron L. Agenbroad